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United States Bankruptcy Court Eastern District of Pennsylvania

Case No. 23-13357-amo
Chapter 13

Debtor's Motion to Extend Time to File Schedules, Statements, and Other Documents

AND NOW, Debtor Edward C. Tomaszewski, by and through their attorney, moves this Court to extend time to file schedules, statements, and other documents. In support of this motion, the Debtor states as follows:

- 1. The Debtor filed this case under chapter 13 on November 6, 2023.
- 2. The schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007 ("the Schedules") were not filed with the petition, and the Court ordered that they be filed on or before November 20, 2023. ECF No. 3. Upon motion of the Debtor, the Court extended this requirement until December 4, 2023. ECF No. 9.
- 3. A debtor may request an extension of time to file the Schedules upon motion and for cause shown. 11 U.S.C. §521(i)(3); Fed. R. Bankr. P. 1007(c).
- 4. The Debtor's proposed next friend has failed to respond to Counsel's various requests for documents needed to prepare the Schedules.
- 5. The Debtor requests an extension to file the Schedules on or before December 18, 2023.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: December 4, 2023 CIBIK LAW, P.C. Counsel for Debtor

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